

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Fitchburg Gas and Electric Light Company

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D.T.E. 02-24/25

ATTORNEY GENERAL'S MOTION TO RECALL WITNESS ASBURY

The Attorney General hereby asks the Department to recall for testimony on cross examination Karen Asbury, rate design witness for Fitchburg Gas and Electric Light Company.

As grounds for this Motion, the Attorney General states the following:

1. On August 15 and 16, 2002, the Attorney General stated on the record that he was reserving his rights to ask follow-up questions to Ms. Asbury regarding questions of other parties and record responses. Tr.6, p, 748; Tr. 7, 841.
2. Ms. Asbury was originally scheduled for testimony, if needed, on September 6, 2002.
3. Additional examination of Ms. Asbury is needed on the following three rate design topics:
 - a) how the Company intends to recalculate its design day-based allocators (follow-up to RR-AG-18-20);
 - b) the Company's electric load research program (follow-up to RR-AG-22 and 23); and
 - c) seasonal bill impacts (follow-up to RR-AG-24 and 25). It is important for the record to reflect how large combined base and fuel/CGAC impacts may be, as was dramatically demonstrated in the early 1990's for Commonwealth Electric Company.

WHEREFORE, the Attorney General hereby asks the Department to recall witness Karen

Asbury for testimony on cross examination for half a day or less on September 6, 2002.

Respectfully submitted,

Edward G. Bohlen
Wilner Borgella, Jr.
Assistant Attorneys General
Utilities Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200

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